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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND APPLICATION FOR  
ARREST WARRANT**

I, Guy Gino, being first duly sworn, depose and say:

**Introduction and Agent Background**

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) and have been so employed since 2003. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7) and I am authorized by law to conduct investigations and to make arrests for felony offenses. I am currently assigned to the Assistant Special Agent in Charge, Portland, Oregon. Prior to this, I was employed as a U.S. Border Patrol Agent and have been a federal law enforcement officer since September 1996. I am authorized and assigned to investigate violations of federal laws, including 21 U.S.C. §§ 841(a)(1), 846, 848, and 843(b) of the Drug Abuse Prevention and Control Act of 1970; that is, possession with intent to distribute and the distribution of controlled substances, conspiracy to commit such offenses, the operation of a continuing criminal enterprise, and the use of a communication facility to facilitate a felony violation of the Drug Abuse Prevention and Control Act of 1970. During my tenure as a federal law enforcement officer, I have investigated and/or participated in investigations of conspiracy, money laundering, narcotics trafficking, fraud, smuggling and theft. I have also acquired knowledge and information about the illegal drug trade and the various means and methods by which it is furthered including through the use of computers, smart phones, digital media and the Internet from formal and informal training, other law enforcement officers and investigators, informants, individuals I have arrested and/or interviewed, and from my participation in other investigations. I am currently detailed to the High Intensity Drug

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Trafficking Area (HIDTA) Interdiction Taskforce (HIT) located at the Portland Police Bureau's Drugs and Vice Division in Portland, Oregon.

**Applicable Law**

2. The Controlled Substances Act (CSA), Title 21, U.S.C. §801, *et. seq.*, is the statute establishing federal drug policy under which the manufacture, importation, possession, use and distribution of certain substances is regulated. The CSA classifies drugs into five schedules. Schedule I drugs, substances or chemicals are defined as drugs with no currently accepted medical use and a high potential for abuse. Schedule I drugs are the most dangerous drugs of all the drug schedules with potentially severe psychological or physical dependence. 3,4-dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide, also known as U47700, is a "controlled substance" within the meaning of 21 U.S.C. § 802; U47700 is a "Schedule I" controlled substance as defined by 21 U.S.C. § 812. Pursuant to 21 U.S.C. § 841(a)(1), it is unlawful for any person to knowingly or intentionally manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance. Title 21 U.S.C. § 846 makes it unlawful to conspire or attempt to commit any of the above offenses. Title 21 U.S.C. §843(b) makes it unlawful to use any communication facility, that is, the United States Postal Service, in committing or in causing or facilitating the manufacture, distribution, or dispensing, or possession with intent to manufacture, distribute, or dispense a controlled substance.

**Statement of Probable Cause**

3. On February 16, 2017, HSI Task Force Officers (TFOs) Sean Macomber and Freddie Jackson responded to the address [REDACTED] Portland, Oregon on the report of an accidental fatal drug overdose. The responding investigators identified the deceased as

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eighteen (18) year old Aisha Zughbieh-Collins (Collins). The investigators obtained statements from Collins' mother indicating that Collins obtained controlled substances from the internet. The investigators examined the scene of the overdose and discovered several items including a small plastic baggie with a computer generated adhesive label listing "U47700 1g" that contained white powder, opened USPS Priority Mail Envelopes with labels displaying tracking numbers and return addresses from South Carolina. Investigators also found a notepad that had "0x89cb77cdc", and "36c6069" scribed inside, and a VeriQuick brand pregnancy test kit (which would prove relevant at a later time). The Multnomah County Medical Examiner's office recently returned a report that concluded Collins' cause of death was U47700 toxicity.

4. TFO Sean Macomber reviewed the physical evidence from the crime scene and recognized the handwritten alphanumeric strings in the notepad began with "0x." TFO Macomber believed that the "0x" was a prefix for a hexadecimal Key ID identifying PGP Keys.<sup>1</sup> TFO Macomber performed a search combining the written characters he observed in the notepad on a public key server database. The search revealed that characters represented a hexadecimal KeyID generated on January 8, 2017, whose user ID was "Bitbyabee <emeryliebe@gmail.com>." Because the use of PGP encrypted messages is a necessity to contact most illicit vendors on dark net<sup>2</sup> sites, HSI conducted username queries on multiple dark

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<sup>1</sup> PGP encryption is a tool used to anonymize electronic communications. Only the holder of the encryption key can read a message.

<sup>2</sup> Dark net sites operate on the Dark Web, which cannot be accessed without special software, and the dark net is a smaller part of the Deep Web. The Deep Web is an area of the internet not accessible using typical search engines like Google and accounts for approximately 96% of the internet. The Surface Web or Normal Web, on the other hand, accounts for just 4% of the internet. The vast majority of internet users are only familiar with the existence of Surface Web.

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net sites. The username “Bitbyabee” was subsequently found to have a buyer account on the dark net site AlphaBay.

5. I know that the dark net site AlphaBay operates like an escrow service between buyers and vendors. When a buyer places an order from a vendor’s page for a specific item the AlphaBay site will notify the vendor of the purchase and hold the cost of the item by removing payment, that is, the appropriate amount of bitcoin from the buyers account. The AlphaBay site retains the bitcoin until the seller “finalizes” the sale by notifying the AlphaBay site that the item purchased was received. To finalize an order, the site requests the buyer leave feedback regarding the sale. If the buyer leaves feedback, the item number and description of the sold item is automatically included and displayed on both the buyer’s and vendor’s AlphaBay profile pages. An examination of Bitbyabee’s AlphaBay profile shows that Bitbyabee finalized and left positive feedback for vendor “PeterTheGreat” on February 11, 2017. The item purchased by Bitbyabee was 500 mg of the substance U47700.

6. United States Postal Inspector (USPI) Adam Sale analyzed the USPS Priority Mail postage labels envelopes at the crime scene and determined that the postage was purchased using a third party online postage company that accepts payment in bitcoin. Further, USPI Sale determined that the parcels entered the mail system at the United States Postal Service (USPS) Processing & Distribution Center (P&DC) mail facility in Greenville, South Carolina.

7. HSI Special Agents in Portland served subpoenas on the online postage company requesting records and information regarding the tracking numbers assigned to the opened USPS Priority Mail envelopess found at the crime scene. In their return, the postage company informed that one of the tracking numbers was for postage purchased on February 7, 2017. The package bearing the tracking number was addressed to Collins at [REDACTED] Portland,

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OR 97266. A query of open source and USPS databases determined the return address was provided on the postage label to be fictitious. In their return, the online postage company provided that the account used to purchase the postage instructed the labels be sent to "anibar@sigaint.org."

8. The online postage company's return also provided a second postage label purchased February 13, 2017, for a shipment to Aisha Collins. Similarly, a query of the return address provided on the second postage label determined the return address was fictitious as well. The online postage company informed that the account used to purchase the postage also instructed the postage labels for the undercover purchases be sent to "anibar@sigaint.org."

9. In an effort to identify the source of the U47700 shipped to Aisha Collins, investigators conducted undercover controlled purchases of the U47700 on the AlphaBay site from vendor PeterTheGreat. Upon receipt of the U47700 purchases, investigators noted that the narcotics were secreted inside VeriQuick brand pregnancy test kits, which appeared identical to the kit found at the crime scene on February 16, 2017. USPI Adam Sale confirmed that the packages originated from the Greenville, South Carolina area and that the postage labels were purchased from the same online postage company. The labels contained a fictitious return addresses. After receipt of a HSI administrative subpoena, the online postage company informed that the account used to purchase the postage instructed the labels sent to anibar@protonmail.com.

10. I know that sigaint.org is a secure email service that provided free secure email services. I also know that sigaint.org went offline on February 11, 2017, causing many of its users to seek alternative secure email services like those provided by protonmail.com.

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11. On April 12, 2017, HSI Portland served the online postage company subpoenas for other label purchases where the email addresses “anibar@sigaint.org” and “anibar@protonmail.com” were used to receive the postage labels. While reviewing a portion of the return, investigators discovered that on April 9, 2017, the user of email address “anibar@protonmail.com” purchased a label listing the sender as ‘Ted KHLEBOROD’ with an address [REDACTED] South Church Street Apartment [REDACTED] Greenville, South Carolina 29601.

12. USPI Sale reviewed records for the April 9, 2017, postage label and observed that the April 9<sup>th</sup> postage was part of a bulk postage order for fifty-two (52) parcels that entered the USPS mail stream. According to USPS records, all fifty-two (52) parcels were physically scanned and processed on April 12, 2017, between 4:58:34 EDT and 5:02:06 EDT (less than 4 minutes elapsed time) at the USPS Processing & Distribution Center (P&DC) in Greenville, South Carolina. The compressed scanning and processing time indicates that all of the parcels were transported to the P&DC by one USPS carrier vehicle and were placed in the mail stream at the same time and location. A review of the address information for the fifty-two (52) parcels revealed fifty-one (51) parcels shared the same return address, that is, Watson Insurance, 47 Willow Lane, Spartanburg, South Carolina 29301. One parcel displayed a different return address, that is, TED KHLEBOROD, APT [REDACTED] SOUTH CHURCH STREET, GREENVILLE SOUTH CAROLINA 29601. That parcel was addressed to VITALIY KHLEBOROD, [REDACTED] PA 19053-1930.

13. United States Postal Inspection Service Analysts identified Ana Milena BARRERO as a resident of [REDACTED] S. Church St., Apt [REDACTED] Greenville, South Carolina 29601 and, based on open-source information, is currently involved in a romantic relationship with Theodore Vitaliy KHLEBOROD.

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14. A database background query for KHLEBOROD revealed that KHLEBOROD provided cell phone number [REDACTED] to police officers during an encounter on April 16, 2016. KHLEBOROD has used the cell phone number [REDACTED] as a contact number for several international packages and in connection with a March of 2017, international trip. Investigators also discovered that a search for [REDACTED] in the Facebook search field, caused the Facebook page for Ted Vitaliy to appear. I obtained a photograph of KHLEBOROD from his South Carolina driver's license and, I believe that KHLEBOROD and Ted Vitaliy are the same person. I have also reviewed the publicly accessible portions of KHLEBOROD's Facebook page. According to the Facebook page, KHLEBOROD he is currently in a romantic relationship with Ana Milena BARRERO and has been since May 2, 2016.

15. An HSI Portland Intelligence Research Analyst identified numerous parcels shipped to KHLEBOROD from international sources, including a package seized by Customs and Border Patrol (CBP) in November of 2016. The package was intercepted and found to contain 1015 grams of the Schedule I controlled substance, U47700. The package was addressed to [REDACTED]  
[REDACTED] South Carolina, [REDACTED] a United Parcel Service (UPS) store. HSI database queries reveal that since 2016, sixteen (16) packages from companies agents believe are sources of supply for illegal drugs, were sent and addressed to family members of Ana Milena BARRERO. Of those sixteen (16) shipments, ten (10) shipments to [REDACTED]  
[REDACTED] were from a company or companies associated with previous law enforcement seizures of fentanyl, a scheduled II controlled substance. Two (2) of the sixteen (16) shipments listed [REDACTED] KHLEBOROD's cellular telephone number, on the bills of lading.

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16. During the investigation, investigators have determined that VeriQuick is a specific brand of pregnancy test kits sold by Dollar Tree stores only. According to subpoena return information including a video recording, I know that seventy-one (71) VeriQuick test kits were purchased by two (2) female subjects in a single transaction at a Dollar Tree store in the Greenville, South Carolina area on February 16, 2017.

17. I have observed Ana Milena BARRERO's personal social media account pages to Facebook and Instagram. I was able to observe that BARRERO has a social media associate named Adelaidea Garcia RAMIREZ. Based on the images of BARRERO and RAMIREZ on their social media sites and the images captured by the Dollar Tree store of the above described transaction, I believe BARRERO and Adelaidea Garcia RAMIREZ purchased seventy-one (71) VeriQuick pregnancy tests on February 16, 2017.

18. On April 24, 2017, at approximately 7:15 pm EDT, investigators conducted surveillance of a dark grey Toyota RAV4 bearing South Carolina license plate [REDACTED] leased to BARRERO. The vehicle was located in the parking area of the apartment complex located at [REDACTED] South Church St., Greenville, South Carolina 29601. Investigators observed BARRERO and an unknown female (UF) walk to the vehicle from the apartment complex. Investigators observed BARRERO approach the front passenger seat and move items from the front seat to the back passenger seat. BARRERO entered the driver door and the UF entered the front passenger door. BARRERO departed the apartment complex and drove to the Starbucks store at [REDACTED] Greenville, South Carolina 29601. Agents observed BARRERO park approximately one block away from the Starbucks store and walk the rest of the way with the UF to the store. Investigators observed the women enter the Starbucks and sit at a table for

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approximately 45 minutes before departing the Starbucks and returning to the RAV4 and departing.

19. Investigators then observed the RAV4 travel to the USPS Greenville Main Post Office located at 600 West Washington St, Greenville, South Carolina 29602 and park on the Southeast side of the Post Office near the mail drop connected to the building. Investigators observed BARRERO at the rear of the vehicle with the door open. Investigators lost sight of BARRERO at that time. Approximately one (1) minute later, when investigators returned to the parking lot on the Southeast side of the Post Office, the RAV4 was not in the parking lot.

20. USPI Michael Nicholson and USPI Adam Sale accessed the Post Office and observed the mail in the receptacle for the mail drop. Postal Inspector Sale observed thirty-four (34) USPS Priority Mail envelopes laying near the top of the receptacle and that all of the envelopes displayed the same return address, that is, of "SUPPORT ESSENTIALS, [REDACTED]

[REDACTED] GREENVILLE, SOUTH CAROLINA 29611." USPI Sale queried open source and USPS databases and determined the return address was fictitious. The parcels were seized pending further investigation. On April 25, 2017, USPI Nicholson checked the mail receptacle again. This time USPI Nicholson located and took possession of an additional parcel that was similar to the parcels recovered the evening of April 24, 2017.

21. USPI Sale observed the postage on the subject parcels seized April 24 -25, 2017, and noticed all the parcels displayed postage purchased from the same online postage company as previous mailings in this investigation.

22. On April 25, 2017, investigators conducting surveillance observed BARRERO inside the garage of her apartment complex carrying a blue bag slung over her shoulder. Agents observe BARRERO get into her RAV4 and depart the apartment complex parking lot.

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Investigators followed BARRERO to [REDACTED] Greenville, South Carolina 29609 and observed her enter the building at that location. Investigators lost sight of BARRERO for approximately one (1) minute after she entered the building. Investigators observed BARRERO exit the building, walk to her car, and remove the same blue bag they observed her possess in the garage of her apartment from the RAV4. BARRERO handed the bag to a USPS mail carrier, who took the bag and its contents and put it in the back of his USPS vehicle.

23. Continuing on April 25, 2017, USPI Nicholson and USPI Sale met the mail carrier at 850 Wade Hampton Blvd. The carrier opened the back of his USPS vehicle and USPI Sale observed a blue Ikea bag containing parcels similar in appearance to the parcels recovered from the Main Post Office on April 24, 2017. The mail carrier told USPI Sale that a Latino woman (BARRERO) who he described as having her hair pulled back in a ponytail, approached him while he delivered mail to business located at [REDACTED]. The carrier stated that the woman (BARRERO) had asked him to take the parcels for mailing, agreed and place the parcels in the back of his USPS vehicle. The carrier stated that the woman (BARRERO) departed the building briefly and returned carrying a blue Ikea bag. USPI Nicholson and USPI Sale collected the parcels and took them to the USPIS Greenville office pending further investigation.

24. On April 24, 2017, at approximately 7:35 am EDT and 11:55 pm EDT, HSI TFO Macomber conducted two separate one (1) gram undercover purchases of U47700 from vendor PeterTheGreat on the AlphaBay site. TFO Macomber provided vendor PeterTheGreat with the same two separate law enforcement controlled post office boxes as the recipient addresses. TFO Macomber informed USPI Sale of the addresses he provided to the vendor during the undercover purchases.

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25. USPI Sale inventoried the parcels and determined that a total of fifty – two (52) parcels were seized April 25, 2017. USPI Sale determined that two (2) of the fifty-two (52) parcels each displayed a return address matching the addresses for law enforcement controlled post office boxes and provided by TFO Macomber to PeterTheGreat during the April 24, 2017, undercover transactions.

26. Continuing on April 25, 2017, USPI Nicholson and USPI Sale delivered the two (2) parcels addressed to the law enforcement controlled post office boxes to the Spartanburg County Sheriff's Office (SCSO) forensic laboratory processing. Lab technicians opened the parcels. Each parcel contained a small plastic baggie, inside a second small plastic baggie, containing a white powdery substance marked with a sticker displaying "U47700 1g." One of the parcels also contained an Assured brand knee support and the other contained an Assured brand heat patch. I know that according to a manager at a Dollar Tree store near [REDACTED] in Greenville, on April 25, 2017, a woman matching the description of BARRERO, purchased approximately \$96.00 worth of knee wraps, heat patches and lens cleaners.

27. USPI Sale informed me that, at the time of this submission, SCSO Forensic Chemist Melissa Hendrix has determined that the substance contained in each of the two (2) parcels is indeed U47700, a schedule I controlled substance.

#### CONCLUSION

28. Based on the foregoing, I believe that there is probable cause that THEODORE VITALIY KHLEBOROD and ANA MILENA BARRERO, knowingly and intentionally conspired to possess with intent to distribute and did distribute a substance containing a detectable amount of U47700, in violation of 21 U.S.C. §§841(a)(1), 846 and §843(b). Your affiant, therefore, respectfully request that warrants for arrest be issued for THEODORE

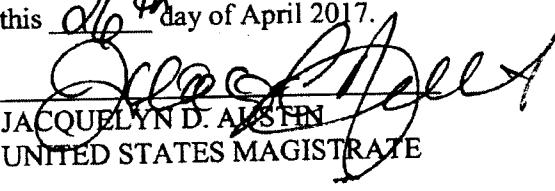
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VITALIY KHLEBOROD and ANA MILENA BARRERO for a violation of 21 U.S.C.

§§841(a)(1), 846 and §843(b).

  
Special Agent Guy Gino  
Homeland Security Investigations

Subscribed and sworn to before me  
this 16<sup>th</sup> day of April 2017.

  
JACQUELYN D. AUSTIN  
UNITED STATES MAGISTRATE